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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**DANIEL HARRIGAN, by and through his  
guardians CAROLE HARRIGAN and  
RANDY HARRIGAN,**

Case No. 6:11-cv-06174-SI

**DEFENDANTS' LAY WITNESS LIST**

Plaintiff,

vs.

**MARION COUNTY, et al.,**

Defendants.

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Defendants may call some or all of the following witnesses at trial. Defendants reserve the right to call additional witnesses for impeachment.

1. Deputy Jason Bernards  
Marion County Sheriff's Office  
100 High Street  
Salem, OR 97301

Testimony – 2 hours.

Deputy Bernards will testify about the encounter with plaintiff, his observations of the encounter and his training.

2. Deputy Jeffrey Sturud  
Marion County Sheriff's Office  
100 High Street  
Salem, OR 97301

Testimony – 2 hours.

Deputy Sturud will testify about the encounter with plaintiff, his observations of the encounter and his training.

3. Deputy Stacy Rejaian  
Marion County Sheriff's Office  
100 High Street  
Salem, OR 97301

Testimony – 2 hours.

Deputy Rejaian will testify about the encounter with plaintiff, his observations of the encounter and his training.

4. Sergeant Shane Burnham  
Marion County Sheriff's Office  
100 High Street  
Salem, OR 97301

Testimony – 2 hours.

Sergeant Burnham will testify about the encounter with plaintiff, his observations of the encounter, his supervision and his training.

5. Deputy Cody Lane  
Marion County Sheriff's Department  
100 High Street  
Salem, OR 97301

Testimony – 45 minutes.

Deputy Lane will testify about the encounter with plaintiff, his observations of the encounter and his training.

6. Deputy Jerry Wollenschlaeger  
Marion County Sheriff's Department  
100 High Street  
Salem, OR 97301

Testimony – 45 minutes.

Deputy Wollenschlaeger will testify about the encounter with plaintiff, his observations of the encounter and his training.

7. Deputy Kevin Rau  
Marion County Sheriff's Department  
100 High Street  
Salem, OR 97301

Testimony – 1 hour.

Deputy Rau will testify regarding training and Sheriff Department policies.

8. Rick Krump  
State Operated Care Program House  
House Manager  
1999 74<sup>th</sup> Avenue, SE  
Salem, OR 97317

Testimony – 45 minutes.

Mr. Krump will testify about his job duties at the MacLeay House, his observations of and interactions with plaintiff, his communications with law enforcement and other staff regarding plaintiff on the night of the incident, his observations of the incident and his observations of plaintiff following the incident.

9. Jean Peterson  
1999 74th Avenue, SE  
Salem, OR 97317

Testimony – 45 minutes.

Ms. Petersen will testify about her job duties at the MacLeay House, her observations of and interactions with plaintiff, plaintiff's attack on her the night of the incident, her need for medical care after the attack, her communications with law enforcement and other staff regarding

plaintiff on the night of the incident, her observations of the incident and her observations of plaintiff following the incident.

10. Yoko Whitfield  
1999 74th Avenue, SE  
Salem, OR 97317

Testimony – 45 minutes.

Ms. Whitfield will testify about her job duties at the MacLeay House, her observations of and interactions with plaintiff, plaintiff's attack on her the night of the incident, her need for medical care after the attack, her communications with law enforcement and other staff regarding plaintiff on the night of the incident, her observations of the incident and her observations of plaintiff following the incident.

11. Brenda Hawks  
1999 74th Avenue, SE  
Salem, OR 97317

Testimony – 45 minutes.

Ms. Hawks will testify about her job duties at the MacLeay House, her observations of and interactions with plaintiff, her observations of plaintiff's attack on her fellow staff members and their need for medical care after the attack, her communications to the 911 operator, communications with law enforcement and other staff regarding plaintiff on the night of the incident, her observations of the incident and her observations of plaintiff following the incident.

12. Steve Holmes  
1999 74th Avenue SE  
Salem, OR 97317

Testimony – 1 hour.

Mr. Holmes will testify about his job duties at the MacLeay House, his observations of and interactions with plaintiff, his communications with paramedics and law enforcement and

other staff regarding plaintiff on the night of the incident, his observations of the incident and his observations of plaintiff following the incident.

13. Damon Frutos – EMT  
Willamette Valley Fire and Rescue  
300 Cordon Rd NE  
Salem OR 97317

Testimony – 15 minutes.

Mr. Fruotos will testify about his response to MacLeay House on September 21, 2010, his communications with the Sheriff's Department and staff regarding medical care for the injured staff members and his observations of the incident.

14. Alex Bancroft – EMT  
Willamette Valley Fire and Rescue  
300 Cordon Rd NE  
Salem OR 97317

Testimony - 15 minutes.

Mr. Bancroft will testify about his response to MacLeay House on September 21, 2010, his communications with the Sheriff's Department and staff regarding medical care for the injured staff members and his observations of the incident.

15. Scott Seaton – EMT  
Willamette Valley Fire and Rescue  
300 Cordon Rd NE  
Salem OR 97317

Testimony – 30 minutes.

Mr. Seaton will testify about the EMT response to MacLeay House on September 21, 2010, communications with the Sheriff's Department and staff regarding medical care for the injured staff members, and observations of the incident.

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16. Kris Williams – EMT  
Willamette Valley Fire and Rescue  
300 Cordon Rd NE  
Salem OR 97317

Testimony – 30 minutes.

Kris will testify about EMT response to MacLeay House on September 21, 2010, communications with the Sheriff's Department and staff regarding medical care for the injured staff members, and observations of the incident.

17. Marion County Sheriff Jason Meyers  
Marion County Sheriff's Department  
100 High Street  
Salem, OR 97301

Testimony – 45 minutes.

Sheriff Meyers will testify about department policies, procedures and training. He will also testify about his personal involvement in matters related to the incident at issue in this case, including any formal review of the incident.

18. Marion County Under Sheriff Troy Clausen  
Marion County Sheriff's Department  
100 High Street  
Salem, OR 97301

Testimony – 45 minutes.

Under Sheriff Clausen will testify about department policies, procedures and training. He

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will also testify about his personal involvement in matters related to the incident at issue in this case, including any formal review of the incident.

DATED this 28th day of August, 2013.

HARRANG LONG GARY RUDNICK P.C.

By: s/ Andrea D. Coit

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Of Attorneys for Defendants

## CERTIFICATE OF SERVICE

I certify that on August 28, 2013, I served or caused to be served a true and complete copy of the foregoing **DEFENDANTS' LAY WITNESS LIST** on the party or parties listed below as follows:

- Via CM / ECF Filing
- Via First Class Mail, Postage Prepaid
- Via Email
- Via Personal Delivery

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## CERTIFICATE OF SERVICE